

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

MAR 12 2025

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
ALPHONSO DIXON,) No.
Defendant.)

4:25CR115-HEA/SRW

INDICTMENT

The Grand Jury Charges:

COUNT 1

18 U.S.C. § 641: Theft of Government Property

From on or about January 1, 2009, through on or about September 30, 2022, within the Eastern District of Missouri, the defendant,

ALPHONSO DIXON,

did embezzle, steal, purloin, or knowingly convert to his use and the use of another, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: Social Security Administration payments for the benefit of E.H. in the amount of \$115,392, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

COUNT 2

42 U.S.C. § 408(a)(4): Concealment from SSA

From on or about January 1, 2009, through on or about September 30, 2022, within the Eastern District of Missouri, the defendant,

ALPHONSO DIXON,

having knowledge of the occurrence of an event affecting the continued right to any benefit payment from the Social Security Administration of any other individual on whose behalf he was receiving such payment, concealed or failed to disclose such event with an intent to fraudulently secure payment when no payment was due or authorized, to wit: **ALPHONSO DIXON** concealed and failed to disclose the death of E.H., knowing that such disclosure would render E.H.'s Social Security Administration benefit payments as not due or not authorized.

In violation of Title 42, United States Code, Section 408(a)(4).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 641 as set forth in Count 1, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said violation.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING,
United States Attorney

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney